

LAW OFFICES  
WILLIAMS & CONNOLLY LLP

725 TWELFTH STREET, N.W.

WASHINGTON, D. C. 20005-5901

(202) 434-5000

FAX (202) 434-5029

August 3, 2021

JAMES W. KIRKPATRICK  
(202) 434-5417  
jkirkpatrick@wc.com

EDWARD BENNETT WILLIAMS (1920-1988)  
PAUL R. CONNOLLY (1922-1978)

Via ECF

Hon. Philip M. Halpern  
Hon. Charles L. Brieant Jr. Federal Building and Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Re: *Buono v. Tyco Fire Products LP*, 17-cv-5915-PMH

Dear Judge Halpern:

I write to request a two-week continuance of oral argument on Defendant Tyco Fire Products, LP's motion for summary judgment (ECF No. 171), which is currently scheduled for October 20, 2021, to November 3, 2021. Counsel for Tyco who will be arguing the Motion<sup>1</sup> has a trial in the Central District of California scheduled to begin on October 12, 2021, and it has become apparent that the trial is likely to commence as scheduled. The trial is likely to last two weeks. Should the trial schedule meaningfully change, counsel for Tyco will promptly notify the Court. If the Court would prefer, counsel for Tyco can confirm that the trial is still on as scheduled as the date gets closer.

No previous requests to continue the hearing have been made. Counsel for Plaintiff consents to this request.

---

<sup>1</sup> Per the Court's Individual Practice 4(M), Tyco notes that arguing counsel is an attorney with less than five years' experience practicing law.

WILLIAMS & CONNOLLY LLP

Hon. Philip M. Halpern  
August 3, 2021  
Page 2

Sincerely,

*/S James Kirkpatrick*

James W. Kirkpatrick

cc: Counsel of record via ECF